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November 23, 2022

VIA ECF

The Honorable Jesse M. Furman United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007 Application GRANTED. The Clerk of Court is directed to terminate ECF No. 25.

SO ORDERED.

November 28, 2022

Re: <u>Baptiste v. CUNY, et al.</u>, 1:22-cv-02785 (JMF)

Dear Judge Furman:

We represent the Plaintiff in the above-referenced matter. We write to respectfully request a two-week extension of time for Plaintiff to file her opposition to Defendants' motion to dismiss. We have conferred with counsel for Defendants before submitting this letter, and Defendants consent. This is the first request to modify the briefing schedule for Defendants' renewed motion to dismiss. If granted, the proposed new deadline for Plaintiff's opposition would be December 23, 2022; Defendants' reply in further support of their motion would be due by January 6, 2023. No other dates or deadlines will be affected by this request.

Plaintiff submits this request due to four recently-scheduled mediations now set to take place before Plaintiff's current opposition deadline. These mediations were not scheduled when the parties submitted their original briefing schedule. Three of these mediations are court-ordered (through either the Sourthern District or Eastern District's mediation programs), two were rescheduled from earlier dates that would not have conflicted with the current deadline, and all were scheduled within the constraints of the presiding mediators' calendars.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

Michael R. Minkoff, Esq.

Copies to: Counsel for Defendants (via ECF)